

December 27, 2011

NOTE TO: Jason Brush  
FROM: Rich Sumner  
SUBJECT: Notes for briefing about my collaborative work in CA –  
January 10@2pm

### Work Theme

The purpose of my work is to help implement California's Wetland and Riparian Protection Policy (WRAPP). The desired outcome is more efficient and better CWA 404/401 decision-making. The outcome is achieved by leveraging state and federal resources and expertise within the 404/401 regulatory programs. And in turn, those resources are leveraged within the state's water quality management programs and habitat management programs.

An indicator of progress will be the routine use of a common set of Standard Operating Procedures (SOPs) for impact and mitigation assessment, and an understanding of the SOPs by the regulated community. Embedded within the SOPs is an accepted set of monitoring and assessment tools; notably CRAM.

### Approach Taken

The "watershed approach" and an associated "assessment framework" form a technical foundation for activity aimed at demonstrating the efficacy of WRAPP. Specific collaborative work is focused on:

Willits Bypass Project  
CAHSR  
SPD's Compensatory Mitigation Crediting SOP  
SPD's Performance Standards SOP  
Delivery of watershed approach training "syllabus" to Water Boards staff  
Delivery of technical assistance to Water Board staff on WRAPP development (writing)

Lessons-learned from collaborative work on the Willits Bypass Project and CAHSR are being applied to SOP and WRAPP development.

### Special Attention for WRAPP in 2012

Phase 1: Adoption of Surface Water Modification Rule in 2012 (i.e., dredge and fill rule).

Near Term Action: Letter of support from EPA Region IX and SAC District with specific reference to complementary nature of "wetland definition," Rule and Policy to the federal program. Also, provide acknowledgement of training needs including "CRAM" and "SOPs."

Phase 2: Adoption of wetland-specific state water quality standards in 2013/2014.

Near Term Action: Preparation of a policy planning note describing the technical foundation and program implications of adoption of wetland-specific water quality standards (e.g., Integrated Reporting and TMDL implementation).

Phase 3: Consideration of riparian buffer requirements in 2014/2015.

Near Term Action: Preparation of a policy planning note describing the technical foundation and program implications of adoption of riparian buffer requirements (e.g., BMPs for TMDL stormwater program implementation)